

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

---

INA STEINER, et al., )  
Plaintiffs, )  
v. ) Civil Action No. 21-CV-11181-PBS  
EBAY INC., et al., )  
Defendants. )  
\_\_\_\_\_  
)

**PLAINTIFFS' MOTION IN LIMINE TO  
EXCLUDE HYPOTHETICAL QUESTIONS TO PLAINTIFFS**

Pursuant To Fed. R. Evid. 401, 402 And 403, Plaintiffs Ina Steiner, David Steiner, and Steiner Associates, LLC (collectively, "Plaintiffs") hereby move, *in limine*, before this Court for:

- (1) an Order precluding Defendants from posing hypothetical questions to the

Steiners.

Respectfully submitted,

Dated: November 20, 2025

/s/ Todd S. Garber

Todd S. Garber  
Finkelstein, Blankinship, Frei-Pearson &  
Garber, LLP  
One North Broadway, Suite 900  
White Plains, NY 10601  
Tel: (914) 298-3283  
tgarber@fbfglaw.com

**CERTIFICATION PURSUANT TO L.R. 7.1(a)(2)**

I, Todd S. Garber, counsel for Plaintiffs, hereby certify that, in accordance with Local Rule 7.1(a)(2), I have conferred with counsel for the other parties, as well as with *pro se* parties.

Date: November 20, 2025

*/s/ Todd S. Garber*

Todd S. Garber

**CERTIFICATE OF SERVICE**

I hereby certify that on November 20, 2025, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants.

Date: November 20, 2025

*/s/ Todd S. Garber*

---

Todd S. Garber